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| **To:** | Comments |
| **Subject:** | RIN 3064-AD74 |
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As to proposed QRM rules:

The cause of the Crisis of "having no skin in the game" seems to be partly misguided.

Underwriting requirements need to be improved with protections in case of individual financial crisis.

While a 20% down payment appears to be a quick fix, it will not stop legitimate defaults when homeowners cash flow is interrupted due to unemployment, disability, etc…

Instead of a 20% down payment requirement, I propose the following:

6+ months of required escrowed mortgage payments.

6+ months built in Forbearance plans based upon legitimate hardships/interruption of normal cash flows.

Temporary built-in modifications as to monthly payments to track real temporary modifications of cash flows.

Valuations standards for underwriting purposes which limits valuations for lending purposes tied to COLA. This would avoid real estate bubbles fueled by lending on unrealistic valuations.

Please consider these suggestions for all players in the market to win. Obviously no one has one in the current real estate collapse.